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9 Attorneys for Defendant
10 PLAID INC.

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 OAKLAND DIVISION
14

15
16 IN RE PLAID INC. PRIVACY LITIGATION
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18

19 THIS DOCUMENT RELATES TO:

20 ALL ACTIONS
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Case No. 4:20-cv-03056-DMR

**DECLARATION OF JOHN PITTS IN
RESPONSE TO THE COURT'S REQUEST RE
PLAINTIFFS' MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT (D146)**

Dept: Courtroom 4 – 3rd Floor
Judge: Donna M. Ryu

Trial Date: None Set

1 I, John Pitts, declare as follows:

2 1. I am the Head of Policy at Plaid Inc. (“Plaid”) and have held this role since
3 September 2018.

4 2. My responsibilities as Plaid’s Head of Policy include representing Plaid in
5 discussions with governments, policymakers, consumer groups, and trade associations;
6 developing and executing Plaid’s policy engagement strategy; and understanding and articulating
7 Plaid’s role in the larger Open Finance ecosystem.

8 3. As the Head of Policy at Plaid, I regularly liaise with stakeholders across Plaid,
9 including colleagues working in Engineering, Product, Legal, Risk, and Revenue, to stay
10 informed and updated about Plaid’s business practices and operations.

11 4. The following facts are within my personal knowledge, and if called and sworn as
12 a witness, I could and would testify competently to these facts.

13 **Plaid’s Data Practices**

14 5. Plaid provides technology that enables consumers to connect their bank accounts
15 and other financial accounts to fintech apps and services of their choosing.

16 6. When a consumer chooses to connect their bank account to their chosen app or
17 service through Plaid, they share certain information with Plaid and other authorized parties, such
18 as the developer of the app or service they are using.

19 7. Plaid’s collection, use, and disclosure of such consumer-permissioned data is
20 described in its End User Privacy Policy, which is available on Plaid’s website at plaid.com/legal.

21 8. As outlined in Plaid’s End User Privacy Policy, Plaid does not sell or rent the
22 personal information it collects about consumers.

23 I declare under penalty of perjury under the laws of the United States that the foregoing is true
24 and correct. Executed this 7th day of October 2021, in Washington D.C.

25
26 By: /s/ John Pitts
27 JOHN PITTS
28 HEAD OF POLICY PLAID INC.

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Whitty Somvichian, attest that concurrence in the filing of this document has been obtained from the signatory. Executed on October 7, 2021, in Oakland, California.

/s/ Whitty Somvichian
Whitty Somvichian

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